

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

BIENVENIDO ALEJANDRO BUSTAMANTE  
HUNGRIA  
dba ALEJANDRO BUSTAMANTE HUNGRIA  
aka ALEJANDR BUSTAMANTE HUNGRIA  
aka BIENVENIDO A BUSTAMANTE HUNGRIA  
aka BIENVENIDOBUSTAMANTE  
SSN: xxx-xx-2563  
2 CALLE HORTENSIA  
APT 15H  
SAN JUAN, PR 00926  
Debtor,

CASE NO. 23-00323/ESL

CHAPTER 13

11 USC 362 d(1) d(2)

Relief from stay for cause

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**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY  
NOTICE, DOCKET NO. 27**

TO THE HONORABLE COURT:

**NOW COMES, BIENVENIDO ALEJANDRO BUSTAMANTE HUNGRIA,**

the debtor through the undersigned attorney, and very respectfully states and prays as follow:

1. On May 16, 2023, Nationstar Mortgage LLC filed a *Motion for Relief from Automatic Stay Notice*, Docket No. 27, alleging that the Debtor is in arrears in the direct post-petition mortgage payments with said creditor, in the sum of \$1,039.56.
2. The Debtor respectfully submits that on May 19, 2023, he made one (1) payment in the sum of \$1,040.00 (confirmation no. 101084822) to Nationstar in order to cure any and all post-petition arrears owed to said secured creditor.
3. Based on the above stated, the Debtor respectfully submits that he is currently up-to-date with the direct post-petition payments to Nationstar and requests that the Court deny Nationstar's motion for relief from stay, Docket No. 27.

**WHEREFORE**, the Debtor respectfully requests from this Honorable Court to deny the motion for relief from automatic stay filed by Nationstar, Docket No. 27.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee Alejandro Oliveras Rivera, Esq.; Robertson, Anschutz, Schneid & Crane, PLLC, Francisco J. Cardona Esquire, Esq, Attorney for Secured Creditor; I also certify that a copy of this motion has been sent via US Postal Service to the Debtor to his address of record.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 24<sup>th</sup> day of May, 2023.

*/s/Roberto Figueroa Carrasquillo*  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
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